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			required, forecast, available, assigned and expended as the process operates to implement the requests in current and future releases. The CLECs propose the on-going sharing of information at each step in the process where the information is likely to change such as prioritization, release package development, release management and implementation, and post implementation. The CLEC's proposal requests that at these points data be provided in the same groupings of categories to allow for tracking and the early detection of potential problems. Appendix I (to which the parties have agreed) providespost implementation data in distinct categories. The CLECs propose Appendix 1-A (See Item 48 below and page 117 of the Updated CCP Document) for the reporting of Pre-Release Capacity Forecast information and changes during the process steps using the same categories as in Appendix 1. With this constancy in the reporting of the basic process data the effectiveness of the process can be analyzed and improvement plans developed. In contrast, BellSouth's proposed language limits providing sizing information to only certain types of change requests, and only at a single point in the process (prioritization). Further it limits the sharing of information on releases to an annual snapshot in a format and grouping inconsistent with Appendix 1 making both in progress evaluation of the process and post implementation evaluations impossible (See Item 48 below and page 118 of the Updated CCP Document). BellSouth's proposal	to provide feature sizing for "all future releases." Such language is overly broad, open ended, and erroneously implies that BellSouth will present an infinite release schedule. Since the CLECs may prioritize on a quarterly basis, a list that shows an infinite schedule of releases would constantly change and would serve no useful purpose. Providing a yearly view of features, as proposed by BellSouth, which includes "known" future releases, is a reasonable alternative. The parties also disagree about the specific feature sizing information that should be provided. The CLECs appendix I-A suggests that there is a set amount of capacity for each category they list by release. This is not the case. Production Releases, whether a CLEC or BellSouth Production Release, can have Types 2, 4, 5, or 6 Change Requests. In the case of the Type 4s and 5s, they are optional and entirely dependent upon whether it is a CLEC or BellSouth Production Release. In either case, during a "Pre-Release" point in time, these releases are open to any and all types as mentioned. Listing Units by category, as the CLECs' proposed Appendix I-A would require BellSouth do so, erroneously presumes that BellSouth knows how much capacity each release, by category of Type Change Request, would have before prioritization and release planning by the CLECs. Although BellSouth could arbitrarily designate release capacity by category, there is no logical basis for doing so. As an alternative,	

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			posted to the website. See Appendix J."	estimated units of capacity of the remaining releases. The remaining capacity is shown as CLEC Production Release(s), BellSouth Production Release(s) and Maintenance Releases. BellSouth's proposed language details the actual deliverables and commitments. BellSouth's language again details how it will provide the information requested by the CLECs. BellSouth provided the information in a release management planning format in order for the CLECs to view it as a project timeline. Maintenance releases are provided with estimated units of capacity. Both public switch network and Type 6 changes are expected to be deployed in these releases. Type 2 (Flow Through) Features were provided with estimated Units of Capacity, along with estimates for Types 4 and 5 change requests. Type 3 is a standalone release and was provided as well.	
44	10.0	O 88-96	This item is still under negotiation between the CLECs and BellSouth and is not being presented to the GA PSC for a decision. The joint development of an updated testing process is underway. It is anticipated that a workshop or other exchange of language for this section to resolve this issue will be held in the near future.	This issue is still under discussion by BellSouth and the CLECs.	
45	11.0 - Terms & Definitio	O 104	This item is still under negotiation between the CLECs and BellSouth and is not being presented to the GA PSC for a decision.	This issue is still under discussion by BellSouth and the CLECs.	

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			excludes the CLECs from access to information about the process as changes occur which is vital to the CLECs internal resource planning. The CLECs are requesting "information on each pending change request" and "all future releases" and that Appendix I-A, which is consistent with Appendix I, be used as the basic structure for release capacity forecast information. BellSouth is willing to provide information only on "Type 4 and Type 5 change requests", and estimated release capacity information only "annually" and only for releases planned for "the following year" using Appendix I-B, which is inconsistent with Appendix I. Limiting the information being provided makes it impossible for the CLECs to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.	BellSouth offers Appendix I-B, which provides pre-release capacity information, expressed in units, and provides the intelligence for the CLECs to determine the pre-release capacity available. It also allows the flexibility and reality of how the Change Request types correspond to release types. For example, Type 6s and PSN mandates are predominantly targeted for maintenance releases, while Types 2s, 4s, and 5s are targeted for production releases in accordance with the BellSouth and CLEC Production Release guidelines. Lastly, Type 3s are targeted for the Industry Release. The information that BellSouth proposes to provide to the CLECs to assist in the prioritization effort, as outlined in Appendix I-B, is reasonable and should be adopted.	
12	4.0 – Part 2 – Step 4 – Note after Act #3 (CCCM)	D 39	In the agreed upon portion of this note BellSouth confirms that the information associated with each change request may change after prioritization. The CLECs request is for the changes to be communicated to them. BellSouth's response is that the limited information it proposes	BellSouth has proposed language to make clear that the release information BellSouth will provide to assist the CLECs in their prioritization efforts relate to Type 4 and Type 5 Change Requests, which are the only Change Requests that CLECs prioritize.	Same as Item 11.

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			CLEC Production Release". Related Items discussed above include 1, 4, 5, 7, 8, 15, 17, 22, 24, 25, 26, 40, and 41. Footnote 15 states "Capacity estimates for change requests and releases will be used as a guide in determining how many change requests will be assigned to these releases." clearly demonstrating that BellSouth is determining release capacity first without consideration of demand, and then limiting the number of changes that can be implemented based upon the arbitrarily determined release capacity. In addition, BellSouth provides four bullets labeled "Release Implementation Hierarchy". The CLECs concur with the first three bullets as written, and would agree to the fourth with the addition of the following phrase "and may be assigned to any production release".	gives the CLECs the necessary tools to make an informed decision to prioritize features, that equitably distributes available release capacity, and that provides assurances that Change Requests will be implemented no later than 60 weeks from prioritization based on the priority assigned by the CLECs and subject to available capacity. BellSouth's proposal, which has been endorsed by KPMG and the Florida Public Service Commission Staff, is reasonable and should be adopted.	
43	6.0 – Part 5	D 76-77	In Part Five many of the individual Items discussed above related to Release Capacity forecasting, Allocation, and Reporting are repeated. Related Items include 11, 12, 13, 14, 16, 17, 18, 19, 20, 27, and 40. The CLEC's proposal is clearly more comprehensive and as discussed above more consistent, with the objectives of the CCP, evaluation of its effectiveness and on-going improvement. The CLECs agree with and adopt the last bullet in BellSouth's proposal "On an ongoing basis, Legacy System Releases will be	BellSouth's proposed language outlines the Forecast and Planning Information that is now available to the CLECs. Most of these tools were not available at the time the CLECs drafted their proposed language or were recently implemented. All of this information was provided at the request of the CLECs and should provide the information necessary for their planning. BellSouth agreed and has provided the estimated units available for Type 3 (typically referred to as an industry release or ELMSx) and has provided the	Same as Item 11.

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			to provide (as discussed in Item 11 above) will not be updated when changes occur.		
13	4.0 – Part 2 – Step 4 - Inputs	D 40	The CLECs request that an input to this step should be the information discussed in detail above in Item 11.	This issue in dispute is related to Item No. 11 and concerns detailing the information that BellSouth provides to CLECs in connection with feature prioritization. BellSouth's proposed language is specific and detailed so there is no confusion about what information BellSouth will be providing. The same cannot be said about the CLECs' proposed language, which merely refers to providing "full release capacity."	Same as Item 11.
14	4.0 – Part 2 – Step 4 - Outputs	D 40	The CLECs request that an output from this step should be any changes to the input information that occurs as a result of the process discussed above in Item 13.	This issue in dispute is related to Item No. 11 and concerns the information that BellSouth provides to CLECs in connection with feature prioritization. Consistent with the process to which the CLECs agreed earlier this year, once the CLECs have prioritized the features, BellSouth provides the Flagship Feature Release Schedule, with a 12-month view of features scheduled, implemented or planned. BellSouth cannot agree to the CLECs' proposed language that purports to require BellSouth to provide feature sizing for "all future releases." Such language is overly broad, open ended, and erroneously implies that BellSouth will present an infinite release schedule. Since the CLECs may prioritize on a quarterly basis, a list that shows an infinite schedule of releases would constantly change and would serve no useful purpose. Providing a yearly	Same as Item 11.

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			necessary infrastructure upgrade or industry standard releases – it was simply based on the assumption that the "2003 program demand would be similar to 2002." In Bullet 8, BellSouth makes a half-hearted and inappropriate commitment that "Total CLEC and BST production releases are equal in estimated number of units capacity." As discussed above in Item 17 there is no justification for this blind allocation of resources and it is in fact detrimental to the accomplishment of the prime objective of the CCP, timely and effective implementation of feature and defect change requests. In Bullets 9 and 10, BellSouth repeats its proposals to limit the scope of the process to "CLEC Production Releases" and "available capacity". In footnote 14 it expressly states that the management and implementation of its own change requests and its own releases will be "outside of this process." BellSouth's proposal prevents the CLECs from being able to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.		
42	6.0 – Part 4	D 75-76	In Part Four many of the individual Items discussed above related to sizing, sequencing and the use of prioritization are repeated. BellSouth's modifications and caveats include "for the release being scoped", "for the next CLEC production release(s)", "may develop several variations of release packages", and "into this	This issue in dispute is related to Item Nos. 4, 7, 24 and 26, which concern the CLECs' request that BellSouth devote unlimited release capacity to implementing every Change Request within 60 weeks of prioritization, which, for the reasons previously explained, BellSouth is unwilling to do. BellSouth has developed a comprehensive prioritization process that	Same as Item 4.

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Item	CCP Section	Stat us Page	CLEC Position	BellSouth Position	Staff Recommendation
				view of features, as proposed by BellSouth, which includes "known" future releases, is a reasonable alternative.	
15	4.0 – Part 2 – Step 5 – Prioritiz ation Meeting	D 40	Once again BellSouth creates an issue that did not previously exist. In its first update of its "green-line" language submitted to the CLECs on 6/24/02, BellSouth added the restrictive language shown here. The timing of prioritization meetings was not previously in dispute between the CLECs and BellSouth. It is not the purpose of this filing to create new issues. The language BellSouth now seeks to amend was not addressed by BellSouth in its February 15th filing, or any of the workshops held during March, April or May. As a matter of procedure The Commission should refuse to consider this particular language. To the extent that the Commission does consider it, the CLECs offer the following comments regarding the proposed restrictions. First, the language BellSouth is seeking to change has been the official schedule for prioritization under the CCP since inception of the process. Second, prioritization is not limited to change requests associated with only CLEC Production Releases, BellSouth's language here would eliminate the prioritization of BellSouth initiated change requests. Third, the regular prioritization of new change requests in essential to their timely implementation and should be the driver of the establishment of new releases rather than being "Dependent on	BellSouth has proposed language to clarify that a prioritization meeting should only be held when applicable.	Language stays the same.

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	7-10		prevents the CLECs from being able to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP. In Bullet 7 BellSouth uses the term "rolling release plan." However, experience has proven that this is nothing more than an annual single point in time snapshot of the next year's preliminary plans. For 2003, this snapshot was not delivered until May of 2002, illustrating that BellSouth is not currently performing any proactive planning based upon change requests submitted to it Change Control Group. The CLEC's related proposals are for the forward looking quarterly updating and sharing of a true rolling release plan for the balance of the current year and the next based upon implementation of prioritized change requests within in a 60 week interval. In Bullet 7, BellSouth further states that it will produce two views, with and without the inclusion of an Industry Standard Release and then require the CLECs to vote between the two. Industry Standard Releases have not and will not occur on an annual basis; the last one was is 1999 and the next one will not be until 2003. The CLEC's related proposals call for the preparation and analysis of a number of alternatives for future release plans resulting in a consensus decision over a planning horizon that addresses all forecast needs, including infrastructure upgrades and industry standard upgrades as required. It is clear from the limited data that BellSouth has provided concerning 2003 that their planning made no allowances for either the	whether or not to have an Industry Release (Type 3s) for a given year or whether to focus on Production Releases (Type 4s and 5s). Furthermore, it defines the equal allocation of capacity between the CLEC and BellSouth Production Releases. Lastly, it defines the commitment to deploy features in a timely manner. This proposal provides the CLEC with the flexibility and options to make their own decisions on how to use the releases in the coming year.	

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			whether a CLEC Production Release is available for prioritization." This is another example of BellSouth's exclusionary and reactive view of the CCP. BellSouth's restrictions have no merit and are clearly an attempt by BellSouth to take advantage of the Commission's participation in resolving these changes to the CCP		
16	4.0 – Part 2 – Step 5, Act #3	D 41	The CLECs request at this step of the process is the same as discussed above in Item 11 for the exchange of forward looking information over a planning horizon of two years for all pending change requests and the releases necessary for their timely implementation. Once again BellSouth's response, limits the information it proposes to share to only Type-4 and Type-5 change requests and a 12 month period. Limiting the information being provided makes it impossible for the CLECs to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.	BellSouth's proposed language concerning the information that will be provided in connection with the CLEC prioritization effort is consistent with the process to which the CLECs agreed earlier this year. BellSouth's proposed language also makes clear that the information BellSouth will provide to assist the CLECs in their prioritization efforts relate to Type 4 and Type 5 Change Requests, which are the only Change Requests that CLECs prioritize.	Same as Item 11.
17	4.0 – Part 2 – Step 5, Act #6	D 41	In this portion of the process the CLEC's proposal results in the preparation of a jointly prioritized plan for the timely implementation of all pending change requests using the required number of unified production releases (releases containing all types of changes – regulatory, defect, BellSouth initiated and CLEC initiated) Unified releases maximize the efficient	BellSouth's proposed language details the approach that should be taken in scheduling the changes for the releases. The CLEC language does not take into account necessary maintenance that is required for efficiency and stabilization, acknowledgement of infrastructure upgrades, nor does it provide flexibility	**BST Language.** **Delete last sentence in the paragraph and replace it with the following:**

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				Production Release. In either case, during a "Pre-Release" point in time, these releases are open to any and all types as mentioned. Listing Units by category, as the CLECs' proposed Appendix I-A would require BellSouth do so, erroneously presumes that BellSouth knows how much capacity by category each release would have before prioritization and release planning by the CLECs. Although BellSouth could arbitrarily designate release capacity by category, there is no logical basis for doing so. As an alternative, BellSouth offers Appendix I-B, which provides pre-release capacity information, expressed in units, and provides the intelligence for the CLECs to determine the pre-release capacity available. It also allows for the flexibility and reality of how the Change Request types correspond to release types. For example, Type 6s and PSN mandates are predominantly targeted for maintenance releases, while Types 2s, 4s, and 5s are targeted for production releases in accordance with the BellSouth and CLEC Production Release guidelines. Lastly, Type 3s are targeted for the Industry Release. The information that BellSouth proposes to provide to the CLECs to assist in the prioritization effort, as outlined in Appendix I-B, is reasonable and should be adopted.	
41	6.0 – Part 2 – Bullets	D 72	In footnote 14 BellSouth expressly states that the management and implementation of its own change requests and its own releases will be "outside of this process." BellSouth's proposal	The bullet points detail the options provided to the CLECs under BellSouth's comprehensive prioritization proposal. That is, the CLECs have the option to select	**BellSouth Language minus the statement " subject to available capacity".**

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			utilization of BellSouth's programming resources. Given that the prioritization and order of implementation under the CLEC's proposal is jointly determined, it is logical that any changes thereafter should be jointly determined and, therefore require CLEC concurrence. In contrast, BellSouth proposes a concept it copied from the change control plan of another ILEC – separate BellSouth and CLEC Production Releases. BellSouth proposes this work effort would only apply to "the CLEC Production Release being scoped". Further, even within the confines of a CLEC Production Release BellSouth refuses to seek CLEC concurrence to changes, committing only to "provide rationale" should it decide to restructure the implementation order. The CLECs are proposing an open, single, unified process for the timely implementation of all change requests regardless of their origin based upon a jointly established prioritization. BellSouth's proposal, in contrast, establishes separate tracks for CLEC initiated changes and BellSouth initiated changes, excludes the CLECs from any participation in the BellSouth track, excludes the CLECs from participation in vital portions of the process in the CLEC track, and reserves to BellSouth the right to implement changes that have not been subjected to the process. This separate track concept is wasteful of the BellSouth programming resources to the detriment of all. Throughout the	in utilizing the maintenance releases as the primary source for defect correction. Fundamentally, BellSouth's proposed language details how it can "dedicate capacity" to the CLECs in order to implement those changes important to them and enable BellSouth to continue with necessary changes to enable it to operate efficiently, which also benefits the CLECs.	" The order of implementation may be altered only with CLEC concurrence".

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Matrix of Disagreed Items
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40a	6.0 – Part 2 5ᵗʰ bullet	D	72	making both in progress evaluation of the process and post implementation evaluations impossible (See Item 48 below and page 118 of the Updated CCP Document). BellSouth's proposal excludes the CLECs from access to information about the process as changes occur which are vital to the CLECs internal resource planning. BellSouth elected to address Section 6.0 – Part 2, bullets 4 and 5 as separate line entries. The CLECs' comments are all included in Item 40	This issue in dispute is related to Item Nos. 11, 18, 19, and 20 and concerns the information to be provided in connection with CLEC prioritization efforts. BellSouth is committed to providing complete and timely information to assist the CLECs, which earlier this year agreed to a process (contained in Appendix H) by which BellSouth provides the feature sizing for the Type 4 and Type 5 Change Requests that are candidates for prioritization. Once the CLECs have prioritized the features, BellSouth provides the Flagship Feature Release Schedule, which contains a 12-month view of features scheduled, implemented or planned. The parties disagree about the specific feature sizing information that should be provided. The CLECs' Appendix 1-A suggests that there is a set amount of capacity for each category they list by release. This is not the case. Production Releases, whether a CLEC or BellSouth Production Release, can have Types 2, 4, 5, or 6 Change Requests. In the case of the Type 4s and 5s, they are optional and entirely dependent upon whether it is a CLEC or BellSouth	Same as Item 40

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			updated BellSouth green-line language, there are references to how BellSouth will manage the CLEC production releases, but not one mention of how it will manage the so-called BellSouth production releases. BellSouth states that its concept provides "parity" - "Estimated capacity for production releases is equal." However, there is no evidence to suggest that a blind equal allocation of capacity has any validity. An analysis of the year 2003 capacity information that BellSouth made available beginning on May 10, 2002, reveals that it is not. In 2003, BellSouth's blind allocation has provided BellSouth with capacity beyond its needs. Regarding potential releases in 2003, BellSouth has provided the CLECs with information on two options. In Option A there would be 2 CLEC production releases, 3 BellSouth production releases and 5 maintenance releases using approximately 3,000 units. In Option B there would be 1 CLEC production release, 2 BellSouth production releases, 5 maintenance releases, and an industry standard release, again using approximately 3,000 units. In each option one of the BellSouth Production Releases was dedicated to an Infrastructure Upgrade, but the capacity required for that release in each option was different as was the capacity needed for maintenance releases. When questioned during the May 22, 2002 Change Control Status and Prioritization Meeting whether the units in Option B for the Infrastructure Release and Maintenance Releases were adequate BellSouth stated that the objectives of the releases		

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			parallel to positions discussed above in Items 11 through 19. In addition, bullets 7 through 10 (including two associated footnotes, all discussed below in Item 41) are proposed by BellSouth as additional explanation of their efforts to limit the CLECs knowledge of and participation in the process. The CLECs propose the on-going sharing of information at each step in the process where the information is likely to change (for example prioritization, release package development, release management and implementation, and post implementation. The CLEC's proposal requests that data at these points be provided in the same groupings of categories to allow for tracking and the early detection of potential problems. Appendix I (to which the parties have agreed) provides post implementation data in distinct categories. The CLECs propose Appendix 1-A (See Item 48 below and page 117 of the Updated CCP Document) for the reporting of Pre-Release Capacity Forecast information and changes during the process steps using the same categories as in Appendix 1. With this constancy in the reporting of the basic process data the effectiveness of the process can be analyzed and improvement plans developed. BellSouth's proposed language in contrast limits providing sizing information to only certain types of change requests, and only at a single point in the process (prioritization). Further it limits the sharing of information on releases to an annual snapshot in a format and grouping inconsistent with Appendix 1	include associated available units of capacity estimated for each release and estimated capacity for each Type 4 and Type 5 Feature that is a candidate for prioritization. This information has been provided for 2003 planning.	

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			could be met with only these units. Thus the information reveals that in Option A BellSouth reserved to itself more capacity than was necessary for the Infrastructure Production Release (105 units) and Maintenance Releases (158), a total of 263 units, about 15 man years work effort. It is clear under both Option A and Option B that BellSouth has manipulated the process to allocate 50% of the non-industry standard and non-maintenance capacity to itself and 50% to the CLEC production releases. This arbitrary allocation has no basis and will impede the timely implementation of all change requests. Individual sizing information for change requests to be prioritized during the May 22, 2002 meeting was provided to the CLECs on May 15. On May 23rd BellSouth provided the results of the prioritization and a total of units for 24 of the 26 changes prioritized. The total was 817 units. An additional 998 units of capacity have been estimated as necessary for the implementation of Type-2 requests from the Flow Through Task Force ("FTTF") in 2003. None of the change requests prioritized on May 22, 2003 can be implemented in 2002 according to BellSouth. Of the 26 requests prioritized, 8 were initiated by BellSouth and, there are currently no other pending BellSouth change requests, nor will there be any other unimplemented BellSouth change requests at year end 2002. The 8 BellSouth initiated change requests require only an		

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				performance or stability or otherwise adversely impact a CLEC.	
38	5.0 – Step 5 Cycle Time	D 65	At this reference point the detailed step level language necessary to make the medium and low impact correction intervals discussed in Items 36 and 37 above operational. The proper intervals based on BellSouth's demonstrated capabilities are 20 and 30 days respectively. See Item 9 above for the full details of the CLECs' support for their proposed language.	This issue in dispute is related to Item Nos. 9, 36, and 37 concerning the timeframes for correcting "medium impact" and "low impact" software defects. As previously explained, BellSouth has proposed reducing the intervals applicable to correcting true software defects in order to address the CLECs' request that software defects be corrected in a shorter period of time. BellSouth can only accommodate this request if the definition of a Type 6 Change Request is clarified to include only true software defects, as BellSouth has proposed in Item No. 8a. Absent this clarification, errors in documenting functionality are considered a Type 6 Change Request, which requires work analogous to adding a new feature to fix and which cannot be accomplished in a shorter amount of time.	Same as Item 8a and 9.
39	6.0 – Part 1 - NOTE	D 71	BellSouth creates an issue with the timing of prioritization sessions that did not previously exist. See Item 15 above for the full details of the CLECs' support for their proposed language.	BellSouth has proposed language to clarify that a prioritization meeting should only be held when applicable.	Language stays the same.
40	6.0 – Part 2 4th & 5th bullets	D 71- 72	BellSouth elected to address Section 6.0 – Part 2, bullets 4 and 5 as separate line entries. The CLECs' comments are all included in Item 40. BellSouth's green-line alternatives for these two bullets are	BellSouth's response does not disagree with the CLEC-requested language but rather explicitly details what the CLECs will receive. That is, BellSouth provides the CLECs options so that they can select a rolling release plan they choose for the following year. The plans	CLEC Language. Use revised Attachment I-A.

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Item	CCP Section	Stat us Page	CLEC Position	BellSouth Position	Staff Recommendation
			estimated 156 capacity units. Despite this fact, under Option B BellSouth has reserved to itself 314 units over and above the Infrastructure Release requirements and in Option A it had reserved 837 units. The establishment of separate releases for 2003 is clearly wasteful of resources and has a negative impact on the timely implementation of the highest priority changes irregardless of their origin, including even the implementation of changes to the infrastructure designed to ensure and improve the stability and performance requirements.		
18	4.0 – Part 2 – Step 5 - Inputs	D 42	The CLECs request that an input to this step should be any changes to the sizing and capacity information that occur as a result of the process discussed above in Item 14.	This issue in dispute is related to Item No. 11 and concerns the information that BellSouth provides to CLECs in connection with feature prioritization. Consistent with the process to which the CLECs agreed earlier this year, once the CLECs have prioritized the features, BellSouth provides the Flagship Feature Release Schedule, with a 12-month view of features scheduled, implemented or planned. BellSouth cannot agree to the CLECs' proposed language that purports to require BellSouth to provide feature sizing for "all future releases," since such language is overly broad, open ended, and erroneously implies that BellSouth will present an infinite release schedule. Because the CLECs may prioritize on a quarterly basis, a list that shows an infinite schedule of releases would constantly change and would serve no useful purpose. Providing a	Same as Item 11.

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Item	CCP Section	Stat us Page	CLEC Position	BellSouth Position	Staff Recommendation
				for resources and enables the defect to be implemented within the release schedule presented to the CCP members. It also would allow BellSouth to meet the CLECs's request that Type 6 defects be corrected in maintenance releases whenever possible thereby not affecting the production releases and their corresponding capacity. Maintenance Releases are normally scheduled any month that a production or industry release is not scheduled, and establishing a forty-five (45) business day interval should allow BellSouth to accommodate the CLECs' request.	
37	5.0 – Low	D 58	BellSouth's recommended alternative language here calls for the correction of low impact defects in 60 business days. The CLEC's propose 30 business days for this same interval. See Item 9 above for the full details of the CLECs' support for their proposed language.	This issue in dispute is related to Item No. 9 and concerns the timeframe for correcting "low impact" software defects, which are defined as failures causing inconvenience or annoyance. The current timeframe for correcting "low impact" software defects is "best effort" because such defects have no immediate adverse impact to the users. As a result, correcting such defects does not and should not take a high priority in implementation, particularly when compared to other Change Requests. Nevertheless, BellSouth is willing to commit to correcting "low impact" software defects within sixty (60) business days, subject to approval of the new BellSouth language to clarify a Type 6 Change Request as a true software defect. Sixty (60) business days is a reasonable amount of time to correct a defect that does not detrimentally affect	Same as Item 8a and 9.

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				yearly view of features, as proposed by BellSouth, which includes "known" future releases, is a reasonable alternative.	
19	4.0 – Part 2 – Step 5 - Outputs	D 42	The CLECs request that an output from this step should be publication and commitment to the results of the work discussed above in Item 17.	This issue in dispute is the same as Item Nos. 11, 14, and 18, which are addressed above.	Same as Item 11.
20	4.0 – Part 2 – Step 6 - Inputs	D 42	The CLECs request that an output from this step should be publication and commitment to the results of the work discussed above in Item 17.	This issue in dispute is the same as Item Nos. 11, 14, and 18, which are addressed above.	Same as Item 11.
21	4.0 – Part 2 – Step 7 - DCCoM	D 42	The CLECs are providing a header to identify the inclusion of the Designated CLEC Co-Moderator (DCCoM) function (discussed above in Item 2 and below in Item 23) in this step of the process. Under BellSouth's current policies and under its proposed new language the CLECs are specifically excluded from participation in this step and have no objective representation.	This issue in dispute is related to Item No. 2 and concerns the CLECs' request to participate in internal BellSouth meetings. BellSouth should be permitted to conduct internal business meetings without CLEC involvement, and there is no need for CLEC participation in those meetings in order for the CCP Process to function efficiently and effectively. The definition of a "CLEC affecting" change has been expanded so as to increase the scope of the CCP, and BellSouth will use the CCP membership Forum for discussing, prioritizing and obtaining final approval for the CLEC Production Releases, as well as for providing the changes in BellSouth Production Releases. CLECs can participate fully in the Change Control Process without participating in internal BellSouth meetings, which would hamper BellSouth's ability to run its business.	Same as Item 2.

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Item	CCP Section	Sub Page	CLEC Position	BellSouth Position	Staff Recommendation
	Paragrap h	57	defect that did not previously exist and as it did above in Item 9 ties reduced implementation intervals discussed below in Item 36 and 37 to it.	concerns the need to clarify a Type 6 Change Request as a true software defect, which would allow BellSouth to shorten the intervals applicable to implementing such Change Requests. The current definition of a Type 6 Change Request includes an oversight in documenting functionality, which is not a true software defect.	
			See Item 2 above for the full details of the CLECs' support for their proposed language.		
36	5.0 – Medium	D 57	BellSouth's recommended alternative language calls for the correction of medium impact defects in 45 business days (or next available maintenance release). The CLECs propose 20 business days for this same interval. See Item 9 above for the full details of the CLECs' support for their proposed language.	This issue in dispute is related to Item No. 9 and concerns the timeframe for correcting "medium impact" software defects. "Medium impact" software defects are defined as an impairment of a critical system function, although a workaround solution does exist. The current timeframe for correcting "medium impact" software defects – ninety (90) business days – was established to comply with an order entered by the Florida Public Service Commission last year in an arbitration initiated by AT&T. Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP. Even though the current timeframe for correcting "medium impact" software defects is the direct result of a state commission order, BellSouth is willing to reduce this interval to forty-five (45) business days, subject to approval of the new BellSouth language to clarify a Type 6 Change Request as a true software defect. Forty-five (45) days is a reasonable amount of time to correct a defect that has an acceptable workaround. This interval allows consideration of the defect priority to other features that may be in development and vying	Same as Item 8a and 9.

CCP Document
Matrix of Disagreed Items

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Item	CCP Section	Stat us Page	CLEC Position	BellSouth Position	Staff Recommendation
22	4.0 – Part 2 – Step 7, Act #2	D 43	BellSouth's statement is that "This step is not necessary since BellSouth will implement CLEC requested features in CLEC Production Releases as guided by the CLEC's prioritization." totally misses the point of the CLEC's proposal for unified releases. Furthermore, BellSouth's position reveals its determination to exclude CLECs from vital steps in the process and reserve to itself complete independence to implement or not implement any given change on a schedule of its own choosing.

As was discovered by KPMG and reported in Florida Third Party Test Exception 88, BellSouth is the only entity that has input to and considers changes at Step 7 of the process that have not been submitted to the CCP as change requests for prioritization.

See Item 1 above for the full details of the CLECs' support for their proposed language. | The issue in dispute is related to Item No. 1, and concerns the CLECs' proposal that BellSouth comply with the CCP, although only as it relates to Type 5 (BellSouth-initiated) Change Requests. BellSouth's proposed language would require adherence to the CCP for all Change Requests (not just Type 5s), but would clarify that BellSouth will implement CLEC-requested features in CLEC Production Releases as guided by the CLECs' prioritization. If for any reason the order of implementation requested by the CLECs cannot be met (e.g., technical constraints), BellSouth will provide the rationale. All Type 2, 4, 5 and 6 Change Requests, regardless of whether implemented in a CLEC or BellSouth Production Release will be communicated to the CCP membership, although BellSouth's Production Releases would not be subject to CLEC approval, as the CLECs' proposed language seeks to do. | Same as Item 1. |
| 23 | 4.0 – Part 2 – Step 7, Act #3 | D 43 | The establishment of the DCCoM function will enhance BellSouth's process and the coordination with the CLEC's parallel internal processes essential to the timely and effective implementation of prioritized changes.

See Item 2 above for the full details of the CLECs' support for their proposed language. | This issue in dispute is related to Item Nos. 2 and 21 and concerns the CLECs' request to participate in internal BellSouth meetings. For the reasons previously explained, BellSouth should be permitted to conduct internal business meetings without CLEC involvement, and there is no need for CLEC participation in those meetings in order for the CCP Process to function efficiently and effectively. | Same as Item 2. |
| 24 | 4.0 – Part 2 | D 43 | In this portion of the process, the CLEC's proposal takes the results of the jointly prioritized plan for the timely | This issue in dispute is related to Item No. 4 and concerns the CLECs' proposed language which would | Same as Item 4 |

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Item	CCP Section	Stat =	Page	CLEC Position	BellSouth Position	Staff Recommendation
	4-X: Negotiated Extended Imp. Feature Process			As discussed in Item 4 above, such a process directly addresses BellSouth's fear that CLECs would wilfully over load the CCP with change requests in order to make it impossible for BellSouth to meet the 60 week implementation interval. BellSouth rejects the concept of a Negotiated Extended Implementation Interval without explanation.	Requests within 60 weeks, it can present its case to the CCP membership and they will be the body to approve whether or not BellSouth is granted a stay of implementation of all features. As previously explained, this proposal is not practical or realistic and would place in the hands of CLECs the level of investment that BellSouth must make in its OSS. To BellSouth's knowledge, no other ILEC is subject to such a Change Control Process.	
33	4.0 – Part 3 – Step 3A	D	55	The CLECs present the detailed Step 3A information necessary to make mutual consent for expedited implementation proposal discussed above in Items 29 and 31 operational. BellSouth's recommended alternative allows BellSouth the unilateral right to expedite its own changes without either consultation with or mutual consent of the CLECs.	The issue in dispute is the same as Item Nos. 28, 30, and 32, which concerns the CLECs' proposal that the level of BellSouth's OSS investment be placed in their hands. BellSouth cannot agree to this proposal for the reasons previously explained.	BST Language.
34	4.0 – Part 3 – Step 4, Act #2	D	55	As BellSouth has confirmed, the processes being considered for change within BellSouth's internal process exist only to support BellSouth's operations to serve the CLECs. There is no relationship to any other portion of BellSouth's business. Despite this the CLECs have no visibility into the process or objective representation within it. See Item 2 above for the full details of the CLECs' support for their proposed language.	This issue in dispute is related to Item Nos. 2, 21, and 23 and concerns the CLECs' request to participate in internal BellSouth meetings. For the reasons previously explained, BellSouth should be permitted to conduct internal business meetings without CLEC involvement, and there is no need for CLEC participation in those meetings in order for the CCP Process to function efficiently and effectively.	Same as Item 2.
35	5.0	D	3rd	Once again, BellSouth creates an issue with the definition of a	This issue in dispute is related to Item No. 8a and	Language stays the same.

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Item	CCP Section	Status Page	CLEC Position	BellSouth Position	Staff Recommendation
Step 7, Act #4, 1st Paragraph h			implementation of all pending change requests developed per the discussion in Item 17 above to determine and schedule the required number of unified production releases (releases containing all types of changes – regulatory, defect, BellSouth initiated and CLEC initiated). Unified releases maximize the efficient utilization of BellSouth's programming resources. BellSouth's proposed modifications exclude CLECs from the process and restrict the scope of the planning process to be reactive rather than proactive. This makes it impossible for the CLECs to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.	require that BellSouth commit unlimited resource capacity to meet an infinite (yet undetermined) amount of demand (i.e., number of CLEC-initiated change requests) merely upon the request of CLECs to implement these features. There are hundreds of CLECs that potentially could make requests for new features. The defined process does not limit the number of CLECs who participate in CCP nor does it limit the number of change request any CLEC may request of BellSouth. No company has unlimited resources, and no ILEC, to BellSouth's knowledge, is subject to a Change Control Process by which CLECs determine the level of OSS investment that the incumbent must make. BellSouth has developed a comprehensive prioritization proposal by which: (i) BellSouth provides the estimated sizes for all features requested for prioritization along with the estimated amount of capacity available for the releases; and (ii) CLECs and BellSouth share equally available release capacity (after all scheduled defects are corrected, all regulatory mandates are implemented, and all needed updated industry standards are built). Under BellSouth's proposal, CLECs have the necessary tools to make an informed decision to prioritize features and determine which should be deployed first, second, etc., and can be assured that Change Requests will be implemented no later than 60 weeks from prioritization based on the priority assigned by the CLECs, and subject to	

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Item	CCP Section	Stat us Page	CLEC Position	BellSouth Position	Staff Recommendation
30	4.0 – Part 3 – Negotiat ed Extende d Impleme ntation	D 48	Here and in the figure identified in Item 32, the CLECs propose a Negotiated Extended Implementation Interval Process. As discussed in Item 4 above, such a process directly addresses BellSouth's fear that CLECs would willfully over load the CCP with change requests in order to make it impossible for BellSouth to meet the 60 week implementation interval. BellSouth rejects the concept of a Negotiated Extended Implementation Interval without explanation.	The issue in dispute is the same as Item No. 28. The CLECs' proposed language is one-sided and would place in the hands of CLECs the level of BellSouth's OSS investment, to which BellSouth cannot agree for the reasons previously explained.	**CLEC Language.**
31	4.0 – Part 3 – Enhance ment – 4th Bullet	D 49	The CLEC's proposal provides for the possible use of an Expedited Feature Process for all types of feature related change requests (2,3,4 and 5) by mutual consent. (See also Item 33 for the associated detailed Step 3A activities.) BellSouth agrees that mutual consent should be obtained for the use of the Expedited Feature Process for Type 3 and Type 5 changes, but reserves to itself the right to unilaterally expedite Type 2 and Type 4 changes. See Item 6 above for the full details of the CLECs' support for their proposed language.	BellSouth agrees with CCP membership concurring to expedites within <u>CLEC Production Releases</u> since these releases are "earmarked" for CLEC requests. Because BellSouth Production Releases are intended for implementing BellSouth priorities (which can include CLEC-initiated Change Requests), BellSouth should not be required to consult the CCP membership for consensus in expediting features into a BellSouth Production Release. BellSouth does agree that the CCP should be notified of these expedite requests in an expeditious manner.	**BST Language.**
32	4.0 Part 3 – Figure	D 40- 50	Here and in Item 30 above, the CLECs propose a Negotiated Extended Implementation Interval Process	The issue in dispute is related to Item Nos. 28 and 30, which concerns the CLEC proposal that, if BellSouth does not have enough capacity to implement Change	**CLEC Language.**

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Item	CCP Section	Stat us Page	CLEC Position	BellSouth Position	Staff Recommendation
				available capacity. BellSouth's comprehensive prioritization proposal is reasonable and has been endorsed by both KPMG and the Staff of the Florida Public Service Commission. Consistent with that proposal, BellSouth recommends keeping the current language in this paragraph and adding the phrase "CLEC Production Release" to clarify which release is involved.	
25	4.0 - Part 2 - Step 7, Act #4 2nd Paragrap h	D 43	As discussed in Item 17 above, given that the prioritization and order of implementation under the CLEC's proposal is jointly determined, it is logical that any changes thereafter should be jointly determined and therefore require CLEC concurrence. A detailed discussion contrasting the impacts of unified versus separate release tracks and, highlighting the negative impacts of BellSouth's separate track proposal can be found in Item 17 above.	BellSouth's suggested language details the approach that should be taken in scheduling the changes for the releases. The CLEC language does not take into account necessary maintenance that is required for efficiency and stabilization, acknowledgement of infrastructure upgrades, nor does it enable flexibility in utilizing the maintenance releases as the primary source for defect correction. Fundamentally, BellSouth has detailed how it can "dedicate capacity" to the CLECs in order to implement those changes important to them and enable BellSouth to continue with the necessary changes to enable it to operate efficiently.	Same as Item 17.
26	4.0 – Part 2 – Step 7, Act #5	D 43	There are two related but separate issues at this CCP section reference. First, the establishment of a 60 week interval for the implementation of feature change requests. Second, the use of joint prioritization to establish unified releases. **60 Week Interval** A major stated and published objective of the CCP is "Timely	The issue in dispute is related to Item Nos. 4, 7, and 24 and concerns the CLECs' request that BellSouth devote unlimited release capacity to implementing every Change Request within 60 weeks of prioritization, which, for the reasons previously explained, BellSouth is unable to do. BellSouth has developed a comprehensive prioritization process that gives the CLECs the necessary tools to make an informed	Same as Item 4.

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Item	CCP Section	Stat us Page	CLEC Position	BellSouth Position	Staff Recommendation
	Part 3 – Header & 1ˢᵗ Paragraph	48	mutual consent will allow either the expedited implementation of a feature change request (Expedited Feature Process) or the implementation of a feature change request beyond the 60 week interval (Negotiated Extended Implementation Process) without prejudice. BellSouth rejects the Negotiated Extended Implementation Process ("BellSouth does not support."), and modifies the Expedited Feature Process to exclude BellSouth initiated changes from the mutual consent requirement.	address BellSouth's concern about having to implement ALL features within 60 weeks as requested by the CLECs. Although the CLECs have proposed that BellSouth implement all features within 60 weeks of prioritization with NO constraints such as capacity, this section states that if BellSouth should not have enough capacity, it can present its case to the CCP membership and they will be the body to approve whether or not BellSouth is granted a stay of implementation of all features. This proposal is not practical or realistic. The CLECs have no incentive to grant BellSouth any relief, no matter how compelling the circumstances. As has been proven in past CCP meetings, the CLECs operate as a coalition against BellSouth, which has only one vote, in any matter when it comes to prioritization and scheduling. BellSouth cannot agree to such one-sided language, which places in the hands of CLECs the level of investment that BellSouth must make in its OSS. To BellSouth's knowledge, no other ILEC is subject to such a Change Control Process.	
29	4.0 – Part 3 – Expedited Feature 2ⁿᵈ Bullet	D 48	The CLECs propose a single process applicable to any feature change request regardless of its origin. See Item 31 below. BellSouth's modifications allow BellSouth the unilateral right to expedite its own changes without either consultation with or mutual consent of the CLECs. Historically, this is exactly how BellSouth has used this process.	BellSouth's recommended language clarifies the agreement for expediting features consistent with CLEC Production Releases.	**BST Language.**

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Item	CCP Section	Stat us Page	CLEC Position	BellSouth Position	Staff Recommendation
			and effective implementation of feature and defect change requests." However, the existing CCP contains no intervals or guidelines for the actual implementation of feature change requests (Type-4 and Type-5 Change Requests, and undated Type-2s). See Item 4 above for the full details of the CLECs' support for their proposed language. **Joint Prioritization / Unified Releases** The BellSouth caveats included in their proposed language here "in the CLEC Production Releases that will occur" and "subject to available capacity" are prime examples of the key differences between the CLEC's and BellSouth's overall positions on the nature of the CCP. See Item 5 above for the full details of the CLECs' support for their proposed language.	decision to prioritize features, that equitably distributes available release capacity, and that provides assurances that Change Requests will be implemented no later than 60 weeks from prioritization based on the priority assigned by the CLECs, subject to available capacity. BellSouth's proposal, which has been endorsed by KPMG and the Florida Public Service Commission Staff, is reasonable and should be adopted.	
27	4.0 – Part 2 – Step 10, Act #4	D 46	Active project management of the implementation of upcoming releases is underway in this part of the process. The CLEC's request the sharing of updated and sizing information as development occurs. BellSouth's response is that it will not provide updates. This makes it impossible for the CLECs to perform mutual impact assessment and resource planning to manage and schedule changes, which is a key objective of the CCP.	BellSouth's language clearly identifies the manner in which estimated units of effort will be provided consistent with the process to which the CLECs agreed earlier this year, which is outlined in Appendix H. The CLECs' proposed language is too general and does not clearly set forth the information that BellSouth is to provide.	**CLEC Language.**
28	4.0	D	The CLEC's propose a process (Exception Process) that with	The CLECs have proposed this section in an attempt to	**CLEC Language.**

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